

**From:** [Elizabeth Hurley](#)  
**To:** [Shawn Flynn](#); [Ned Sackman](#); [Richard C. Gagliuso](#); [Clara E. Lyons](#)  
**Cc:** [Jason Greaves](#); [Jacob Rhodes](#); [Geoffrey Gallagher](#); [Tina MacLeod](#); [Tracey Johnson](#)  
**Subject:** RE: Objections and Responses to 2nd Interrogatories  
**Date:** Tuesday, March 4, 2025 5:27:24 PM

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Good afternoon,

I am following up on discovery and finalizing the dates for your clients' depositions. For the latter, we had tentatively agreed on the first 2 weeks in April. You were going to speak with your clients and get back to us. Please keep in mind that we cannot proceed with the depositions without complete discovery responses. I do not believe that we have received any documents, which were due to us over a month ago. Shawn, you acknowledged this during our video conference a few weeks back and indicated that we would have the discovery shortly. Looking at the details Attorney Sackman outlined to you after the hearing on January 14, 2025, it appears that we are still owed the following:

- Communications between October 1, 2020 through January 31, 2021 relating to whether Trump won the 2020 election
- Materials provided to the January 6 Committee
- All requested documents from 1AP and Mr. Luelsdorff
- Documents and other information relating to monetary damages, including the specific amount of damages plus how it was calculated. I'll note that the answers to the second sets of interrogatories simply refer to the answers to the first sets, which were vague and unsupported
- Privilege log

In order to be able to prepare for your clients' depositions, we need the above discovery within a week from today.

Thank you,

Elizabeth

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**From:** Shawn Flynn <[shawn@binnall.com](mailto:shawn@binnall.com)>  
**Sent:** Tuesday, January 28, 2025 10:32 PM  
**To:** Ned Sackman <[nsackman@bernsteinshur.com](mailto:nsackman@bernsteinshur.com)>; Richard C. Gagliuso <[rgagliuso@bernsteinshur.com](mailto:rgagliuso@bernsteinshur.com)>; Elizabeth Hurley <[ehurley@gssp-lawyers.com](mailto:ehurley@gssp-lawyers.com)>; Clara E. Lyons <[clyons@gssp-lawyers.com](mailto:clyons@gssp-lawyers.com)>  
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**Subject:** Objections and Responses to 2nd Interrogatories

All,

Please find attached to this email Plaintiffs' responses to Defendant's Second Interrogatories.

Thanks,

Shawn

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**Shawn Flynn**

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